

EXHIBIT B

10-5-23 15.08 Craig Cunningham.

MR. SMITH:

Hello.

AMANDA:

Hello. I'm calling from Sokolove
Law.

May I please speak with Craig
Smith?

MR. SMITH:

I'm sorry. Say that again.

AMANDA:

I'm calling from Sokolove Law.
May I speak with Craig Smith?

MR. SMITH:

Yes, that's me.

AMANDA:

Hi. So my name is Amanda from
Sokolove Law on a recorded line, and I'm following
up on the information that was submitted.

Is now a good time to ask some
additional questions?

MR. SMITH:

Certainly.

AMANDA:

Great.

1 And I see this was regarding a
2 Camp Lejeune claim; is that right?

3 MR. SMITH:

4 That's right.

5 AMANDA:

6 In case we're disconnected, is
7 this a good number for us to call back?

8 MR. SMITH:

9 Yeah, this is my number.

10 What's a good number for you guys?

11 AMANDA:

12 This number that I'm calling from.

13 MR. SMITH:

14 Okay.

15 AMANDA:

16 Would this claim be for yourself
17 or someone else?

18 MR. SMITH:

19 For myself.

20 AMANDA:

21 Okay. And did you ever live or
22 work at Camp Lejeune?

23 MR. SMITH:

24 Worked -- lived there, yeah.

25 AMANDA:

1 Okay. Were you there for at least
2 30 days between 1953 and 1987?

3 MR. SMITH:

4 Yeah. It was about two years.

5 AMANDA:

6 Okay. Okay. I see here it says
7 June of '76 to August of '78.

8 MR. SMITH:

9 Yeah.

10 AMANDA:

11 And since living at the base, have
12 you been diagnosed with cancer?

13 MR. SMITH:

14 Yes. Liver.

15 AMANDA:

16 I'm so sorry to hear that.

17 When were you diagnosed?

18 MR. SMITH:

19 It was about four years ago.

20 AMANDA:

21 And have you ever been diagnosed
22 with fatty liver disease, renal toxicity, CREST
23 syndrome or Parkinson's disease?

24 MR. SMITH:

25 Yeah. It was renal toxicity as

1 well.

2 AMANDA:

3 Okay. When were you diagnosed
4 with that; same time?

5 MR. SMITH:

6 Yeah.

7 AMANDA:

8 Have you been diagnosed with any
9 other conditions?

10 MR. SMITH:

11 I don't think so. It's all in the
12 medical records, though.

13 AMANDA:

14 Okay. Since living at the base,
15 have you suffered from any neurobehavioral
16 effects, like tremors, confusion, delayed
17 reactions, memory loss, vision problems, changes
18 in your mood or balance issues?

19 MR. SMITH:

20 Yeah. Balance and tremors.

21 AMANDA:

22 Okay. When did you start to
23 notice these symptoms?

24 MR. SMITH:

25 It was like 2016 to 2020.

1 AMANDA:

2 Thank you.

3 And what treatment have you
4 received for your diagnosis overall?

5 MR. SMITH:

6 Chemotherapy.

7 AMANDA:

8 Any specialists, been
9 hospitalized?

10 MR. SMITH:

11 Yes. I've seen specialists.

12 Yeah. And they ran a bunch of tests as well.

13 AMANDA:

14 What about ER visits or physical
15 therapy or any surgeries?

16 MR. SMITH:

17 Yeah, definitely several hospital
18 visits and lab tests that they ran as well.

19 AMANDA:

20 Mm-hmm (affirmative response).

21 Okay.

22 Did you ever serve in the
23 military?

24 MR. SMITH:

25 No.

1 AMANDA:

2 You were a family member?

3 MR. SMITH:

4 Yeah. My -- my dad was in the
5 Army -- or Marines.

6 AMANDA:

7 Okay. And did you live on base or
8 off base when you were there?

9 MR. SMITH:

10 On base.

11 AMANDA:

12 Do you happen to remember the name
13 of the neighborhood?

14 MR. SMITH:

15 No, not offhand. I can go look it
16 up.

17 AMANDA:

18 Okay. Do you currently have an
19 attorney assisting you with this matter.

20 MR. SMITH:

21 No.

22 AMANDA:

23 All right. So that we can stay in
24 touch, I want to make sure we have some good
25 contact information. The email address we have

1 for you is [REDACTED].com; is that
2 correct?

3 MR. SMITH:

4 Mm-hmm (affirmative response).

5 Yeah.

6 AMANDA:

7 Okay.

8 MR. SMITH:

9 Can -- can you guys just shoot me
10 an email real quick with your contact info so I
11 have all that?

12 AMANDA:

13 Yes, sir. Once I submit the
14 information it's automatically gonna send.

15 MR. SMITH:

16 Oh, okay.

17 AMANDA:

18 And -- okay. May I also have your
19 -- a good mailing address four?

20 MR. SMITH:

21 Yeah. 3000 Custer Road, Suite --

22 AMANDA:

23 What was the street name?

24 MR. SMITH:

25 Custer, C-U-S-T-E-R.

1 AMANDA:

2 Mm-hmm (affirmative response).

3 MR. SMITH:

4 Road, Suite 270-206, that's Plano,
5 Texas 75075.

6 AMANDA:

7 Thank you.

8 And may I have your date of birth?

9 MR. SMITH:

10 Yeah. [REDACTED], 1960.

11 And where did you guys originate
12 my information from?

13 AMANDA:

14 Let me see. It actually doesn't
15 say.

16 Let me see if it says here. It
17 says that it was sent through our website,
18 Sokolove Law.

19 MR. SMITH:

20 Okay. Yeah, I talked to somebody
21 last couple days about it.

22 AMANDA:

23 Yeah. I see the information --
24 just some brief information was submitted on our
25 website and that's it.

1 MR. SMITH:

2 Mm-hmm (affirmative response).

3 Okay.

4 AMANDA:

5 Would you like to receive updates

6 --

7 MR. SMITH:

8 What was submitted?

9 AMANDA:

10 Let me go back. Give me one
11 moment.

12 It doesn't actually say when it
13 was submitted.

14 MR. SMITH:

15 Oh, okay.

16 AMANDA:

17 And there's no co-counsel either.
18 So it doesn't even say that it was through another
19 firm, so it was directly through our website.

20 MR. SMITH:

21 Okay.

22 AMANDA:

23 And the date isn't on here. The
24 only date that I have is today.

25 MR. SMITH:

1 Mm-hmm (affirmative response).

2 All right.

3 AMANDA:

4 Would you like to receive updates
5 about the claim via text message?

6 MR. SMITH:

7 Email's fine.

8 AMANDA:

9 Okay. Okay. Let me just make
10 sure I have everything put in.

11 All right. So the Sokolove Law
12 legal team often works with other law firms to
13 help us determine what the best course of action
14 is gonna be for each case.

15 MR. SMITH:

16 Mm-hmm (affirmative response).

17 AMANDA:

18 So do I have your permission to
19 share your information with other firms that we're
20 working with on the Camp Lejeune claim?

21 MR. SMITH:

22 Sure. Do -- do you know which
23 firm it's gonna be?

24 AMANDA:

25 I don't know what firm would be

1 working with you specifically. It looks like
2 they're gonna have to review the information first
3 before determining that. We work with several
4 different law -- law firms, Environmental
5 Litigation Group, Bell Legal Group. There's a few
6 other ones, but those are the two mains that we're
7 working with on this Camp Lejeune claim.

8 MR. SMITH:

9 Mm-hmm (affirmative response).

10 AMANDA:

11 But they'll let you know before
12 sharing the information, if they do, who they are.

13 MR. SMITH:

14 Okay. Sounds good.

15 AMANDA:

16 Okay. All right. So I'd like to
17 get you transferred over to one of our case
18 managers who's gonna get some additional
19 information and let you know what the next steps
20 are gonna be.

21 Do you mind if I place you on a
22 brief hold?

23 MR. SMITH:

24 Sure.

25 AMANDA:

1 Great. One moment please.

2 TIA:

3 Good afternoon, Sokolove Law firm.
4 This is Tia, case manager. Recorded line.

5 AMANDA:

6 Hi. This is Amanda from
7 Voice-Ter. I have a Camp Lejeune caller on the
8 line. The file number is [REDACTED]. And this is a
9 Mr. Craig Smith, and I just completed intake.

10 TIA:

11 Okay. One moment.
12 That name sounds familiar. Give
13 me one moment here.
14 Did you do more than one for him
15 or just him?

16 AMANDA:

17 No. It was just him.

18 TIA:

19 Okay. I'm gonna do -- let me just
20 double-check. One moment.

21 AMANDA:

22 Yeah.

23 TIA:

24 Yeah. We did -- we did one with
25 him. Why that name's so familiar. We did it one

1 -- three days ago. I'll talk to him.

2 AMANDA:

3 Okay. I'll go ahead, transferring
4 now.

5 TIA:

6 I got you. Thank you, ma'am.

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10-5-23 15.17 Craig Cunningham.

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line. The file number is [REDACTED]. And this is a
Mr. Craig Smith, and I just completed intake.

Okay. One moment.

That name sounds familiar. Give
me one moment here.

Did you do more than one for him
or just him?

MR. SMITH:

No. It was just him.

AMANDA:

Okay. I'm gonna do -- let me just
double-check. One moment.

MR. SMITH:

Yeah.

AMANDA:

Yeah. We did -- we did one with
him. Why that name's so familiar. We did it one

REDACTED PII

1 -- three days ago. I'll talk to him.

2 MR. SMITH:

3 Okay. I'll go ahead, transferring
4 now.

5 AMANDA:

6 I got you. Thank you, ma'am.

7 TIA:

8 Hello, Mr. Smith.

9 MR. SMITH:

10 Yes.

11 TIA:

12 Hi. Good afternoon. My name is
13 Tia. I'm a case manager here with Sokolove Law
14 firm on a recorded line.

15 MR. SMITH:

16 Okay.

17 TIA:

18 I -- I see that she did the claim;
19 however, we already had a claim processed for you
20 on the 2nd of -- well, about three days ago
21 roughly.

22 Did you get the paperwork for that
23 claim yet?

24 MR. SMITH:

25 Yeah. I was -- I was actually a

1 little -- where did you get the other claim info
2 from?

3 TIA:

4 The original claim?

5 MR. SMITH:

6 Mm-hmm (affirmative response).

7 TIA:

8 So the original claim I have came
9 in on the 2nd of October. You actually spoke with
10 our tier one agents, one of the agents that just
11 transferred you over. I see that you would spoke
12 with Miss Angelique on the 2nd at --

13 MR. SMITH:

14 Okay.

15 TIA:

16 -- 2:53 p.m. Eastern time roughly.

17 MR. SMITH:

18 Okay. She works for you guys or
19 does she work for somebody else?

20 TIA:

21 She's a -- she's -- she works with
22 Sokolove Law firm. She's a tier one agent, so
23 she, like, gets, like, the claim information and
24 then --

25 MR. SMITH:

1 Uh-huh (affirmative response).

2 TIA:

3 -- normally they'll get the
4 paperwork sent to you. If it has to come me, like
5 a case manager, then that's when you get sent to
6 me.

7 MR. SMITH:

8 Okay.

9 TIA:

10 But she is an actual member of our
11 team, yes.

12 MR. SMITH:

13 Yeah. I wasn't sure about how
14 this whole thing works exactly.

15 TIA:

16 Oh, no problem. I can explain.
17 So what happens is this claim is open to any ser-
18 -- service member, family member, mom, dad, kids,
19 grandparents, et cetera, or civilian employee
20 stationed at Camp Lejeune or the other seven
21 bases, and that's housing on or off base, any time
22 1953 and 1987. So you qualify, you know, just
23 being there as well.

24 I see that I have the liver cancer
25 which is -- some diagnosis we're looking at is

1 cancer just. Fatally liver -- fatty liver disease
2 is another thing we're looking into as well.

3 MR. SMITH:

4 Mm-hmm (affirmative response).

5 TIA:

6 And then also the neurological, so
7 yes. We're looking into all those things and
8 other health care conditions too, because this is
9 not conclusive as well. And that's the only
10 requirement literally just being there and --
11 being on the base and living there. That's the
12 only requirement. And then, of course, any other
13 health care conditions.

14 What happens is a tier one agent
15 -- if they're able to get enough information, like
16 to get the claim processed, which Miss Angelique
17 -- Angelique did on the 2nd. That's why paperwork
18 was actually generated, which is a contract that
19 says you'd like for us to represent you. This is
20 all free. Contingency -- rela- -- contingency
21 relation, excuse me. And also in the -- there's a
22 contract, military release form, and medical
23 release form. By default since there's email on
24 file, we did send it by email, but a hard copy
25 will be mailed out as well to you and -- by

1 tomorrow at the latest with a hard copy.

2 MR. SMITH:

3 Okay.

4 TIA:

5 Yeah. The same thing coming in
6 hard copy. So whichever one you choose to return
7 is up to you.

8 And then our co-counsel firm,
9 Wallace & Graham, that's actually the firm gonna
10 be going to court for you. They're actually in
11 this -- I call it my southeast corridor out of
12 Salisbury, North Carolina. They actually
13 specialize in (inaudible) claims, that's what they
14 do. And so they will be taking over the claim
15 basically once the paperwork comes back in and our
16 legal team gets that file sent to them. And then
17 after that, honestly, Wallace & Graham is very
18 hands on.

19 So once they get your claim
20 information from us, one -- and the person who
21 works on your file is gonna call you. They use
22 text, email and regular mail, but they'll let, you
23 know, like what they're working on. They do do
24 like Zoom sessions, webinar sessions as well too.
25 But they will keep you updated on all that as

1 well.

2 MR. SMITH:

3 Okay.

4 TIA:

5 And that's it. Yeah.

6 Any other questions, concerns?

7 MR. SMITH:

8 All right, sounds good.

9 Mm-mm (negative response).

10 TIA:

11 Okay. Well, Mr. Smith, my name --
12 again, my name is Tia with Sokolove Law. Thank
13 you for calling back to check. You have a good
14 rest of your week and weekend. And we'll talk to
15 you in a few weeks?

16 MR. SMITH:

17 All right. Thanks.

18 TIA:

19 Thank you. Mm-hmm (affirmative
20 response).

21 Bye-bye.

22

23

24

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